

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

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2007 SEP 25 A 9:42

DEBRA P. HACKETT, CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

NATHANIEL SHAW,
PLAINTIFF,

v.

D. T. MARSHALL, et al.,
DEFENDANTS.

CIVIL ACTION NO. 2:07-CV-606-ID

MOTION REQUESTING LEAVE TO FILE
MOTION FOR PRODUCTION OF DOCUMENTS

COMES NOW PLAINTIFF NATHANIEL SHAW, "PRO SE"
PURSUANT TO THE APPROPRIATE RULE AND AUTHORITY
AND SHOWS UNTO THE HONORABLE JUDGE GOOD CAUSE
FOR THE MOTION TO BE GRANTED.

(1) PLAINTIFF NATHANIEL SHAW, IS WITHOUT COUNSEL
AND ATTORNEY, AND IS UNTRAINED IN THE SCIENCE
OF LAW.

I. THE EVIDENCE IN POSSESSION OF THE DEFENDANTS
IS VITAL FOR THE SUMMARY JUDGEMENT, AND FOR
FULL FACTUAL PROOF OF THE COMPLAINT NOW PENDING

II. THE EVIDENCE, IS IMPORTANT FOR THE DISPUTES
AND FALSE AFFIDAVITS THAT HAVE BEEN FILED
IN BAD FAITH NOW BEFORE THIS HONORABLE

COURT.

III. THE DEFENDANTS HAVE ACTED TO PROVIDE FULL PERJURY BEFORE THIS HONORABLE COURT TO KNOWINGLY DECEIVE AND ALTER THE OUTCOME OF AN OFFICIAL PROCEEDING.

THE FOLLOWING DOCUMENTS TO BE DELIVERED:

- (1) THE ARREST REPORTS AND ARREST AFFIDAVITS OF DATE MAY 9, 2007 OF PLAINTIFF NATHANIEL SHAW, IN THE POSSESSION OF THE CITY OF MONTGOMERY POLICE DEPARTMENT.
- (2) THE REGULATIONS, CUSTOM, POLICY AND (SOP) FOR ARRESTING, RESTRAINT, AND HANDCUFFING A PERSON FOR POSSIBLE FELONY ARREST. OF THE CITY OF MONTGOMERY POLICE DEPARTMENT. CITY OF MONTGOMERY, ALABAMA.
- (3) THE PRELIMINARY HEARING TRANSCRIPT OF PLAINTIFF NATHANIEL SHAW, HELD ON JUNE 8, 2007 BEFORE THE HONORABLE SHARON YATES, IN THE DISTRICT COURT OF MONTGOMERY ALABAMA. QUESTIONS OF DEFENSE COUNSEL AND TESTIMONY OF ARRESTING OFFICERS FOR PROBABLE CAUSE.
- (4) THE REGULATIONS CUSTOMS, POLICY, AND (SOP) FOR ARRESTING, RESTRAINT, AND HANDCUFFING A PERSON FOR FELONY ARREST BY THE MONTGOMERY COUNTY

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SHERIFF DEPARTMENT.

(5.) THE MEDICAL POLICY AND REGULATION FOR INMATES BOOKED INTO THE MONTGOMERY COUNTY DETENTION FACILITY.

(1) THE SCREENING PROCEDURE BY MEDICAL,

(2) THE SCREENING FOR VITAL SIGNS AND MEDICATION UPON INITIAL INTAKE.

(6) THE LIST OF COMPLAINTS, MEDICAL EMERGENCIES, AND DEATHS ALLEGED FOR LACK OF MEDICAL SCREENING, PROPER TIMELY MEDICAL VITAL SIGNS, AND LACK OF NOTICE BY BOOKING OFFICERS FROM 2004 TO PRESENT DATE.

(7.) TO PRODUCE THE RECORD OF INMATE HANDBOOK ISSU TO PLAINTIFF NATHANIEL SHAW UPON INITIAL INTAKE. THE COPY OF ORIENTATION PROCEDURES FOR INMATES.

(8.) TO PRODUCE THE MEDICATION ALERT BY BOOKING FOR INMATES RECEIVED UNDER CHRONIC CARE, BLOOD PRESSURE, HEART, SEIZURE, DIABETIC, AND ALL OTHER KNOWN MEDICAL EMERGENCY MEDICATIONS. TO INCLUDE ALL PROCEDURES AND (SOP) FOR MEDICAL STAFF TO PROMPTLY RESPOND TO.

(9.) PRODUCE THE (SOP) FOR INMATES WHO ARE BOOKED AND UNDER THE INFLUENCE OF DRUGS AND OR ALCOHOL.

- (10.) PRODUCE THE (SOP) AND POLICY OF INJURED INMATES UPON INITIAL INTAKE INTO THE MONTGOMERY COUNTY DETENTION FACILITY.
- (11.) PRODUCE ALL VIDEO AND AUDIO TAPES OF THE ARREST OF PLAINTIFF NATHANIEL SHAW BY THE CITY OF MONTGOMERY POLICE DEPARTMENT.
- (12.) PRODUCE THE MEDICAL REFERRAL (SOP) FOR OUT-SIDE MEDICAL TREATMENT BY THE MONTGOMERY COUNTY DETENTION FACILITY.
- (13.) PRODUCE THE ITEMIZED LIST OF ALL PROPERTY TAKEN OFF PLAINTIFF NATHANIEL SHAW, DURING THE ARREST OF MAY 9TH 2007 BY THE OFFICERS OF THE MONTGOMERY CITY POLICE DEPARTMENT.

WHEREFORE WITH ALL ORDERS OF THIS HONORABLE COURT AND THE APPLICABLE RULE OF FEDERAL CIVIL PROCEDURE YOUR PLAINTIFF NATHANIEL SHAW, PRAYS THE HONORABLE JUDGE WILL ENTER A ORDER TO THE DEFENDANTS TO PRODUCE ALL REQUESTED DOCUMENTS WITHIN (30) DAYS OF THE ORDER.

5 OF 6

IT IS SO PRAYED
UNDER THE PENALTY OF PERJURY
DONE ON THIS DAY 23RD OF SEPTEMBER 2007

RESPECTFULLY
s. Nathaniel Shaw

NATHANIEL SHAW

89354

MONTGOMERY, CO. D. F.

P.O. BOX 4599

MONTGOMERY, ALABAMA

36103

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CERTIFICATE OF SERVICE

CIVIL ACTION NO. 2:07-CV-606-ID

I, NATHANIEL SHAW, DO HEREBY CERTIFY
THAT A TRUE AND CORRECT COPY OF THE
FOREGOING HAS BEEN FURNISHED BY VIA U.S.
MAIL ON THIS 23RD DAY OF SEPTEMBER 2007 TO;

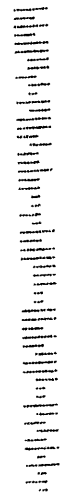
- (1) CLERK OF UNITED STATES DISTRICT COURT
P.O. BOX 711 MONTGOMERY, ALABAMA
36101-0711
- (2) WAYNE P. TURNER, P.O. BOX 152
MONTGOMERY, ALABAMA 36101-0152
COUNSEL FOR DR. JOHNNY E. BATES
- (3) ALLISON H. HIGHLEY, CITY OF MONTGOMERY, LEGAL DEPT.
P.O. BOX 1111, MONTGOMERY, ALABAMA 36101-1111
COUNSEL FOR A.D. BAYLOR, C.J. COUGHLIN, DET. HALL
- (4.) CONSTANCE C. WALKER, P.O. BOX 4660
MONTGOMERY, ALABAMA 36103-4660
COUNSEL FOR D.T. MARSHALL; GINA SAVAGE;
C. SMITH, SONDRA WRIGHT

SIGNED S. Nathaniel Shaw
NATHANIEL SHAW

89354

M. C. D. F.

P.O. BOX 4599
MONTGOMERY, AL.
9/25/07



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30201116 # 89354 M.D.A.

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36103

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OF ALABAMA

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